

## Code of Conduct

This code of conduct applies to all Kirkhouse Trust (KT) representatives, namely:

- KT's Trustees, and
- KT's staff, consultants and volunteers.

### 1. OUR SHARED VALUES

Acting with professional and personal integrity always:

- we are honest and trustworthy in our activities and relationships;
- we are committed to fair and ethical practices;
- we always treat colleagues and others with respect;
- we follow the Kirkhouse Trust's policies and procedures;
- we abide by applicable laws; and
- we report integrity concerns to a member of KT's senior management or externally to the Office of the Scottish Regulator via its whistleblowing scheme.

### 2. CORE PRINCIPLES

#### 2.1 Ethics and Integrity

KT is committed to complying with all applicable laws and regulations. KT representatives are expected to observe the highest ethical standards in their dealings with each other and third parties, and to act fairly and honestly, with personal and professional integrity in a manner befitting KT's vision and be accountable for their actions.

KT has a zero-tolerance policy regarding bribery and corruption, money laundering and tax evasion.

Please view our [Ethics Policy](#)

#### 2.2 Intellectual Property

KT encourages and supports the free flow of scientific knowledge and research materials, primarily in the form of public goods.

KT representatives and grantees agree to facilitate the sharing and transfer of technology and research products for both research and commercial use benefiting small-holder farmers.

Please view our [Intellectual Property Policy](#)

#### 2.3 Conflicts of Interest

KT representatives must avoid conflicts of interest by ensuring their decisions, transactions and/or relationships do not place personal interests ahead of those of KT and colleagues. Any ethical, financial, legal or other conflicts of interest should be disclosed.

#### 2.4 Environmental, Social, and Governance

KT is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation, irrespective of gender, race, colour, disability, political opinion, sexual orientation, age, religion, social or ethnic origin, or health status.

## **2.5 Conduct while travelling abroad**

When travelling abroad for work, all KT representatives are expected to uphold high standards of professional integrity and honesty.

## **2.6 Extortion, bribery and financial crime**

All KT representatives are expected to comply with all applicable laws and promote international best practices, including those laws and international best practice standards intended to prevent extortion, bribery and financial crime.

## **2.7 Gifts and donations**

Gifts and donations cannot be accepted by KT representatives.

## **2.8 Health and Safety**

KT is committed to the health and safety and welfare of all KT representatives. KT representatives are expected to undertake and act on relevant risk assessments.

## **2.9 Anti-Discrimination/Harassment**

All KT representatives are expected to avoid all forms of discrimination and harassment. Reports of any forms of discrimination or harassment shall be treated very seriously.

## **2.10 Privacy**

KT is committed to complying with privacy and data protection laws and will respect people's privacy, confidentiality of information and the cultural contexts in which it operates.

## **2.11 Green Policy**

KT is committed to minimise its environmental footprint in its offices (by reducing waste and consumption of non-renewable energy) and in its operations. KT representatives are required to travel to fulfil KT's purpose. The carbon footprint of all flights KT purchases is calculated, and KT offsets against this by investing in green initiatives.

## **2.12 Procurement and Dispatch**

Fraud risk – KT recognises there are potential risks in the procurement of goods, for example it could be possible for a member of staff to gain personally from procuring items intended for KT.

Suppliers - we use suppliers for lab goods which meet the following criteria:

- operate under an accredited ISO 9001:2015 quality standard system,
- have anti-bribery and anti-slavery statements,
- have a green environmental policy, and
- preferably ISO 14001:2015 environmental management accreditation.

Staff involved in procurement do not accept gifts from suppliers, except for very low value promotional items such as ballpoint pens.

## **3. ZERO-TOLERANCE AND SPEAKING UP**

KT has zero-tolerance for all illegal activities (including but not limited to bribery and corruption, money laundering and tax evasion (or facilitation of tax evasion)) and for any forms of sexual, physical or psychological harassment, abuse or exploitation or

breaches of this code of conduct. Any KT Representative or third party who has cause for concern regarding the propriety or legality of any action should report these either to a line or senior manager, with the assurance that those who report unlawful or inappropriate behaviour in good faith will be protected from retaliation. At the same time, anyone who may become the subject of a complaint will be treated fairly and with respect whilst the outcome of the complaint is being determined.

#### **4. POLICIES AND PROCEDURES**

All KT representatives will adhere to the following policies and procedures (see list below) that support the above Core Principles:

Equal Opportunities Policy  
Whistleblowing Policy  
Anti-Corruption and Bribery Policy  
Data Protection Policy

Please contact us for details about these policies.

The Code is reviewed regularly to make sure it is consistent with the rest of KT's policies, as well as the law.

September 2023